

THE HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

BLACK LIVES MATTER SEATTLE-  
KING COUNTY, ABIE EKENEZAR,  
SHARON SAKAMOTO, MURACO  
KYASHNA-TOCHA, ALEXANDER  
WOLDEAB, NATHALIE GRAHAM,  
AND ALEXANDRA CHEN,

Plaintiffs,

v.

CITY OF SEATTLE,

Defendant.

No. 2:20-cv-00887-RAJ

DECLARATION OF CHASE BURNS  
BRODERICK IN SUPPORT OF MOTION  
FOR TEMPORARY RESTRAINING  
ORDER

I, Chase Burns Broderick, declare and state as follows:

1. The information contained in this declaration is true and correct to the best of my knowledge, and I am of majority age and competent to testify about the matters set forth herein.

2. I am a Seattle resident and am employed as a journalist at *The Stranger*, a biweekly newspaper. I have been reporting on the recent protests against police brutality, which have largely taken place directly outside *The Stranger's* offices overlooking 11th and Pine in Capitol Hill.

1           3.       Shortly after midnight on June 8, 2020, I was in the office with a group of  
2 coworkers and photojournalists from Reuters and KUOW, as well as a few freelance  
3 photographers. We were all reporting on the protests taking place outside our windows.

4           4.       On the third floor where we had all been working, my coworkers and I were  
5 celebrating the midnight hour as the date changed, because we hadn't had a chance to celebrate  
6 the June 7th birthday of one of my coworkers. We had stepped away from the windows to take a  
7 quick break, blow out the candles on her cake, and enjoy each other's company.

8           5.       An armed man had driven his car into the crowd earlier that evening and had shot  
9 a protester, but the demonstration since then had been peaceful. I understand that the Seattle  
10 Police Department released a statement saying that another armed man had entered the area at  
11 some point around midnight, but I did not observe that. My impression was of a relatively  
12 uneventful demonstration.

13          6.       Very suddenly, chaos exploded outside. My coworkers and I stopped the birthday  
14 celebration and ran to the windows to observe and record. A true and correct copy of this video  
15 footage is posted on my Twitter page. Tweet by Chase Burns Broderick at 12:06 a.m. on June 8,  
16 2020, <https://twitter.com/chaseburnsy/status/1269888560129208323>.

17          7.       Law enforcement had deployed a shocking amount of tear gas, which quickly rose  
18 through the air and began to permeate our offices. The visiting photojournalists put on gas  
19 masks provided by their employers. My coworkers and I did not have that kind of protective  
20 equipment; our newspaper is small and community-based, and we can't afford it.

21          8.       Even all the way up on the third floor, my coworkers and I began coughing,  
22 struggling to breathe, and crying from the burning in our eyes. My boyfriend, who was in the  
23 office keeping me company, had to take shelter in a windowless bathroom because he felt like he  
24 was having an asthma attack. The pain and discomfort we experienced were incredible given our  
25 distance from the center of the action.  
26

1           9.       We soon realized that, despite being closer to the mayhem on the ground, the  
2 second floor was less impacted by the gas because its windows were more thoroughly sealed.  
3 My coworkers and I decided to take shelter below. The other reporters, with their gas masks,  
4 were able to continue reporting from the third floor.

5           10.       With better windows keeping out the gas, my coworkers and I recovered and were  
6 able to begin reporting again. We documented the scene below over the course of the next three  
7 hours, as law enforcement continued to deploy tear gas, flash bangs, and what appeared to be  
8 rubber bullets against an increasingly scattered crowd. The explosions were incessant.

9           11.       During this time, I felt like I was reporting on a war zone: there were constant  
10 deafening booms, flashes of bright light, screams, and a haze of choking tear gas drifting over it  
11 all. At one point, I witnessed a protester drop to the ground after being struck by a projectile.  
12 Other protesters rushed to give aid, but the police did not pause their assault. I recorded this  
13 incident. A true and correct copy of this video footage is posted on my Twitter page. Tweet by  
14 Chase Burns Broderick at 12:13 a.m. on June 8, 2020,  
15 <https://twitter.com/chaseburnsy/status/1269890344331571201>.

16           12.       I filmed as law enforcement aligned themselves in the street below as if in a  
17 battalion. I observed an armored vehicle. Police on bikes moved briskly through clouds of gas  
18 as protesters continuously scattered and regrouped. A true and correct copy of this video footage  
19 is posted on my Twitter page. Tweet by Chase Burns Broderick at 12:18 a.m. on June 8, 2020,  
20 <https://twitter.com/chaseburnsy/status/1269891485941460992>.

21           13.       Those of us in the building remained huddled inside, documenting as much as we  
22 could from the windows.

23           14.       At around 2:30 a.m., we considered trying to leave and go home, because it  
24 seemed like the chaos might finally be subsiding. Just before we left, however, the police again  
25 began deploying tear gas and flash-bangs. We feared for our safety on the street, so we decided  
26 to stay sheltered in place.

1           15.     At approximately 3:00 a.m., we were at last able to exit and hurry home. After  
2 over two hours of listening to and observing law enforcement's assault on the protesters, I was  
3 shocked and upset.

4           16.     It remains unclear to me what triggered such a severe police response. Again, I  
5 did not observe anyone below who appeared to have a weapon, although the fog of gas could  
6 have obscured such a person. Regardless, I am deeply concerned that a prolonged attack on a  
7 largely peaceful crowd in a residential area was not a proportionate response. I do not  
8 understand why the presence of an armed man would justify the indiscriminate use of chemical  
9 agents and projectiles against an otherwise peaceful crowd for three painful, frightening hours.

10          17.     This experience, and others like it from this past week, have fundamentally  
11 changed how I view my role as a journalist. I no longer feel safe reporting from the ground.  
12 Even journalists from larger news organizations who are equipped with gas masks do not feel  
13 safe reporting from the ground—which is why they have been sheltering with us in our offices. I  
14 am committed to delivering news to the public, so I will continue working as best as I can from  
15 my vantage point in *The Stranger's* building. But my experience as a journalist is now  
16 characterized by anxiety, and a need to balance my own safety with the interest of delivering  
17 valuable information to Seattleites.

18          18.     Reporting has become a nightly exercise in fear, anxiety, and frustration for me as  
19 I prepare myself to endure gas and explosions, and to watch from my office as the people below  
20 me suffer these militaristic tactics in even greater proximity.  
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1 Executed this 9th day of June 2020 at Seattle, Washington.

2 I declare under penalty of perjury under the laws of the United States and the State of  
3 Washington that the foregoing is true and correct.

4  
5 By:   
6 CHASE BURNS BRODERICK